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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Javier Gonzalez Mexicano,)	Case No. 2:21-cv-01130-EFB
Plaintiff,)	STIPULATION AND PROPOSED
vs.)	ORDER FOR EXTENSION OF
Kilolo Kijakazi, Acting)	TIME
Commissioner of Social Security,)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from May 23, 2022 to July 22, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists for this extension. First, Counsel for the Plaintiff underwent major orthopedic surgery on March 17, 2022, and is dealing with post-operation pain and the

1 secondary effects of medications; and as a result, is working short periods
2 throughout the day with significant breaks throughout. Counsel will also undergo
3 12 weeks of physical therapy, four days a week.

4 Secondly, as this Court is well aware, Social Security case filings in federal
5 court increased due to a combination of factors including an increase in appeals
6 council decisions and an increase in hearings at the administrative levels. Then, as
7 a result of the pandemic, shelter-in-place mandates, and Court ordered Stays, there
8 were significant delays in producing transcripts. In recent months, Counsel for the
9 Plaintiff has received a greater-than-usual number of Answers and Certified
10 Administrative Records from defendant including over 56 cases in February and
11 March of 2022.

12 For the week of May 16, 2022 through the end of May 2022, Counsel for
13 Plaintiff has 18 merit briefs, and several letter briefs and reply briefs.

14 Defendant does not oppose the requested extension. Counsel apologizes to
15 the Defendant and Court for any inconvenience this may cause.

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17 Respectfully submitted,

18 Dated: May 16, 2022 PENA & BROMBERG, ATTORNEYS AT LAW
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20 By: /s/ Jonathan Omar Pena
21 JONATHAN OMAR PENA
22 Attorneys for Plaintiff
23


24 Dated: May 16, 2022 PHILLIP A. TALBERT
25 United States Attorney
26 PETER K. THOMPSON
27 Acting Regional Chief Counsel, Region IX
28 Social Security Administration

1 By: **/s/ Patrick Snyder*
2 Patrick Snyder
3 Special Assistant United States Attorney
4 Attorneys for Defendant
5 (*As authorized by email on April 28, 2022)
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PROPOSED ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: May 17, 2022.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE